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P.O. Box 3051 Louisville, KY 40201 6/27/03

Docket Management Room PL-401 400 Seventh Street, S.W. Washington, D.C. 20590

Reference:

U.S. Docket Number NHTSA.2003-14375-39

Title: Characteristics of Motorcycle Operators

OMB Clearance Number: None

Under OMB's regulations, 5CFR1320.8(d), the following comments are made to above referenced Docket Number NHTSA.2003-14375.

The proposed collection of information is <u>NOT</u> necessary for proper performance of the US D.O.T. NHTSA, nor does it have any practical utility. Nothing mentioned in the Abstract of the purpose of this study can be accomplished. The study is so limited in its scope and in its approach, that the objective of providing updated information about rider, operator characteristics, attitudes and behaviors will not be achieved. For this reason, the study also does not support the National Agenda for Motorcycle Safety.

The method of collecting information is invalid, and the assumptions employed are also invalid. The collection technique -Interviews at improper venues, with limited samples in an uncontrolled environment can not produce a representative sample of motorcycle owners and operators. This can only result in a bias study model.

The only way to enhance the quality, utility and clarity of the information sought in this study is to expand it. If this is not possible, the study should be canceled. The only way to achieve the stated goal, "... to help focus current programs and activities to achieve the greatest benefit, to develop new programs, to decrease the likelihood of such crashes and provide informational support to states, localities, law enforcement agencies, and motorcyclists that will aid them in their efforts to reduce motorcyclist crashes and fatalities." is to expand the study to include a major crash causation employing "Organization for Economic Cooperation and Development (OECD) Common Methodology.

Please take these comments into consideration prior to receiving OMB approval.

Sincerely yours,

Malcolm C. Winsper, V.P.

Kentucky Motorcycle Association